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Counsel for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB

**NACHAWATI LAW GROUP
 PLAINTIFFS' OPPOSITION TO
 DEFENDANTS UBER TECHNOLOGIES,
 INC., RASIER, LLC, AND RASIER-CA,
 LLC'S MOTION TO DISMISS CASES
 FOR FAILURE TO COMPLY WITH
 AMENDED PTO 10**

This Document Relates to:

*Jane Doe NLG (M.M.) v. Uber Technologies,
 Inc., et al., No. 3:25-cv-02653-CRB*

Judge: Honorable Charles R. Breyer
 Date: January 16, 2026
 Time: 10:00 a.m.
 Courtroom: 6 – 17th Floor

I. INTRODUCTION

On December 19, 2025, Defendants filed a Motion to Dismiss cases of certain Plaintiffs for failure to comply with Amended Pretrial Order 10 (“PTO 10”). (ECF 4737). Counsel acknowledges and understands that under PTO 10, the court created procedures and deadlines to produce verifications for Plaintiff Fact Sheets (“PFS”). (ECF 4287). Counsel has diligently attempted to comply with the production of the documents required for the discovery obligation

1 of the Plaintiff addressed in this motion. Counsel has utilized extensive efforts to reach clients,
 2 predating the filing of Defendant's motion. (Schulte Dec. at ¶ 4).

3 4 **II. ARGUMENT**

5 Counsel has worked diligently in reaching the above-referenced claimant. Through
 6 counsel's diligence, a Second Amended PFS and PFS verification for Jane Doe NLG (M.M.)
 7 (MDLC ID 3157) was produced via MDL Centrality on December 19, 2025. (Schulte Dec. at ¶
 8 5). Therefore, Jane Doe NLG (M.M.) should be excluded from Defendant's motion.

9 10 **III. CONCLUSION**

11 For the foregoing reasons, Counsel respectfully requests this Court deny Defendant's
 12 motion as to the above-referenced Plaintiff who has complied with the Court's order.

13 Dated: December 29, 2025

Respectfully submitted,

15 By: /s/ Steve Schulte
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